

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 13644
5 PHILLIP N. SMITH, JR.
6 Assistant United States Attorney
7 Nevada Bar Number 10233
8 501 Las Vegas Boulevard South, Suite 1100
9 Las Vegas, Nevada 89101
(702) 388-6336 / Fax: (702) 388-5087
Phillip.Smith@usdoj.gov

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U.S. MAGISTRATE JUDGE

BY _____

7 *Counsel for the United States*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 EDUARDO LIMON,

14 Defendant.

15 Magistrate No. 2:19-mj-00122-NJK

16 **COMPLAINT** for violations of :

17 Title 18, United States Code, Sections 922(j)
18 and 924(a)(2) - ***Possession of a Stolen Firearm***

19 Title 26, United States Code, Sections 5841,
20 5861(d), and 5871 - ***Possession of an***
Unregistered Firearm

21 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
22 Complainant, being duly sworn, deposes and states:

23 **COUNT ONE**

24 ***Possession of a Stolen Firearm***

On or about February 12, 2019, in the State and Federal District of Nevada,

EDUARDO LIMON,

defendant herein, knowingly possessed a stolen firearm, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe that the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT TWO

Possession of an Unregistered Firearm

On or about February 12, 2019, in the State and Federal District of Nevada,

EDUARDO LIMON,

defendant herein, knowingly possessed a firearm that had not been registered in the National Firearm Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

PROBABLE CAUSE AFFIDAVIT

Complainant, Christopher D. Loudermilk, as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), states the following as and for probable cause:

1. Your Affiant is a Special Agent employed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and has been in that position since May 2018. Your Affiant is currently assigned to the Las Vegas Field Office and responsible for investigating violent crimes, to include, but not limited to gang activity, narcotics violations, and federal firearms violations. Your Affiant have has approximately thirteen years of experience of prior law enforcement as a city police officer with the cities of Newport News Virginia, Staunton Virginia, and Charlottesville Virginia. Your Affiant's training and experience as a Police Officer includes, but is not limited to investigating gang activity, narcotics possession and distribution, firearms offenses, robbery, burglaries, felonious assaults, domestic disturbances, response to critical incidents, Riot Control, interviewing, as well as numerous other state and local offenses.

1 2. The following information contained within this Criminal Complaint is based
 2 upon my own participation in this investigation, as well as information and reports provided to
 3 me by other law enforcement personnel. This Affidavit does not necessarily include any and all
 4 information reference this investigation, but rather only those facts necessary to establish
 5 Probable Cause. All times noted are approximate.

6 **FACTS ESTABLISHING PROBABLE CAUSE**

7 3. During the timeframe of January 20, 2019 and January 29, 2019, a total of 65
 8 firearms were stolen from the business inventory of four separate Federal Firearms Licensees
 9 (FFLs) at the 2019 Shooting, Hunting, and Outdoor Trade (SHOT) Show, located at the Sands
 10 Expo Center, 201 Sands Ave., Las Vegas, NV 89169. The items reported stolen are further
 11 described as follows:

<u>MAKE</u>	<u>MODEL</u>	<u>CAL.</u>	<u>TYPE</u>	<u>SERIAL #</u>	<u>FFL</u>
Tisas-Trabzon	Regent SP-1	9mm	Pistol	T0620-17CA00152	LKCI, Ltd.
Tisas-Trabzon	Regent SP-2	9mm	Pistol	T0620-17CA00156	LKCI, Ltd.
Tisas-Trabzon	Faith 13	.380	Pistol	T0620-18J00041	LKCI, Ltd.
Tisas-Trabzon	Regent P45	.45	Pistol	T0620-17Y00415	LKCI, Ltd.
Tisas-Trabzon	Regent P45	.45	Pistol	T0620-17BT00007	LKCI, Ltd.
Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17AP00002	LKCI, Ltd.
Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17BU00005	LKCI, Ltd.
Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17BU00006	LKCI, Ltd.
Advanced Armament	Cyclops	.50	Silencer	500097	Remington Arms
High Standard	103	.22LR	Pistol	1183064	Remington Arms
Ruger	22/45 Lite	.22LR	Pistol	391-23465	Remington Arms
Advanced Armament	Cyclops	.50	Silencer	50-0061	Remington Arms
Heckler & Koch	MP5A3	9mm	Machine Gun	62-334300	Remington Arms
Advanced Armament	Mini-4	5.56	Silencer	A10438	Remington Arms
Advanced Armament	Aviator 2	.22LR	Silencer	AV203427	Remington Arms

1	Advanced Armament	Aviator 2	.22LR	Silencer	AV203428	Remington Arms
2	Advanced Armament	762-SD	7.62	Silencer	B15561	Remington Arms
3	Glock	43	9mm	Pistol	BBUF003	Remington Arms
4	Denel Land Systems	SS77 MK1	.30-06	Machine Gun	DLS00233	Remington Arms
5	Advanced Armament	Element 2	.22LR	Silencer	EL22987	Remington Arms
6	Remington	R4E	5.56	Machine Gun	FFR000018	Remington Arms
7	FNH	FNX-45	.45	Pistol	FX3U036523	Remington Arms
8	Advanced Armament	MG-SD	7.62	Silencer	G0826	Remington Arms
9	Advanced Armament	MG-SD	7.62	Silencer	G0829	Remington Arms
10	Advanced Armament	SR-5	5.56	Silencer	H00750	Remington Arms
11	Advanced Armament	Halcyon	.22	Silencer	HAL0275	Remington Arms
12	Advanced Armament	Halcyon	.22	Silencer	HAL0278	Remington Arms
13	Advanced Armament	Halcyon	.22	Silencer	HAL0635	Remington Arms
14	Smith & Wesson	M&P9	9mm	Pistol	HPX4209	Remington Arms
15	Advanced Armament	Illusion	9mm	Silencer	IL902694	Remington Arms
16	Advanced Armament	M4-2000	5.56	Silencer	M08138	Remington Arms
17	Advanced Armament	M4-2000	5.56	Silencer	M6593	Remington Arms
18	Remington	R-10	7.62	Rifle	MA000085	Remington Arms
19	Remington	R-5	5.56	Rifle	MB000046	Remington Arms
20	Springfield	XDM	9mm	Pistol	MG445400	Remington Arms
21	Advanced Armament	MK13-SD	.300WM	Silencer	MK00496	Remington Arms
22	Advanced Armament	MK13-SD	.300WM	Silencer	MK00499	Remington Arms
23	Marlin	1894	.357 MAG	SBR	MR53419E	Remington Arms
24	Advanced Armament	762-SDN-6	7.62	Silencer	N12665	Remington Arms

1	Remington	1911R1	9mm	Pistol	RHH018551	Remington Arms
2	Remington	700	.308 WIN	Pistol	RR30824L	Remington Arms
3	Remington	700	6.5	Rifle	RR30968L	Remington Arms
4	Glock	19	9mm	Pistol	SGX924	Remington Arms
5	Advanced Armament	Titan-QD	.338 LM	Silencer	TI 00002	Remington Arms
6	Advanced Armament	Tirant45M	.45	Silencer	TIQD 01525	Remington Arms
7	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00001	Remington Arms
8	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00002	Remington Arms
9	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00004	Remington Arms
10	Advanced Armament	300TM	.300 WM	Silencer	TM00324	Remington Arms
11	Advanced Armament	300TM	.300 WM	Silencer	TM10196	Remington Arms
12	Advanced Armament	Tirant45M	.45	Silencer	TR45M 0044	Remington Arms
13	Advanced Armament	Tirant45M	.45	Silencer	TR45M 0075	Remington Arms
14	Advanced Armament	Tirant45M	.45	Silencer	TR45M04953	Remington Arms
15	Advanced Armament	Tirant9M	9mm	Silencer	TR9M01210	Remington Arms
16	Advanced Armament	Tirant9M	9mm	Silencer	TR9M01211	Remington Arms
17	Advanced Armament	Tirant9M	9mm	Silencer	TR9M01267	Remington Arms
18	Advanced Armament	SR-7	7.62	Silencer	X01341	Remington Arms
19	Advanced Armament	SR-7 L	7.62	Silencer	X01394	Remington Arms
20	Advanced Armament	SR-5	5.56	Silencer	X50210	Remington Arms
21	Glock	34	9mm	Pistol	YVY715	Remington Arms
22	Sauer & Sohn	S100	6.5	Rifle	C017857	Blaser USA, Inc.
23	Mauser	M18	6.5	Rifle	LC014288	Blaser USA, Inc.
24	Mauser	M18	6.5	Rifle	LC014277	Blaser USA, Inc.
	UNK	1911	.380	UNK	CIT066652	Legacy Sports Intl.
	UNK	1911	.380	UNK	CIT066651	Legacy Sports Intl.

1 4. On February 8, 2019, the ATF Las Vegas Field Office was first informed of the
2 aforementioned thefts and thereby commenced an investigation, in conjunction with the Las
3 Vegas Metropolitan Police Department (LVMPD) Crime Gun Intelligence Center (CGIC).
4 It should be noted that all of the firearms identified as a "silencer" or a "machine gun" or an
5 "SBR" are firearms required to be registered in the National Firearms Registration and Transfer
6 Record.

7 5. It should be noted that the SHOT Show requires FFLs to either disable or
8 remove the firing pins from all displayed firearms prior to them entering the Sands Expo
9 Center.

10 6. On February 9, 2019, the ATF issued an FFL Alert to licensees located within
11 Clark County, Nevada. The FFL Alert requested licensees to be attentive for any individuals
12 seeking gunsmithing services or, more specifically, firing pins.

13 7. On February 10, 2019, C.M., the owner/manager of Gun Shop Las Vegas, an
14 FFL located at 2980 St. Rose Pkwy., Ste. #130, Henderson, NV 89052, contacted the ATF Las
15 Vegas Field Office in reference to the aforementioned FFL Alert. C.M. advised that, on
16 February 9, 2019, three individuals, further described as being a Hispanic male adult (HMA), a
17 black male adult (BMA), and a black female adult (BFA), entered his business. C.M. further
18 advised that the HMA purchased a Mossberg & Sons, Model Maverick 88, 12-gauge shotgun,
19 serial number MV0334608. Upon acquiring a copy of the ATF Firearms Transaction Record
20 (ATF Form 4473) in reference to said transaction, the HMA was identified as Eduardo
21 LIMON.

22 8. C.M. advised that the BMA and LIMON inquired about a firing pin for an AR-
23 style firearm. C.M. asked whether they had lost or broken the firing pin, to which LIMON and
24 the BMA replied they were told by an associate that the firing pin needed to be replaced when it

1 was cleaned. Based upon this conversation, C.M. arrived at the conclusion that the individuals
2 were unfamiliar and/or new to firearms. C.M. advised that he inquired as to what LIMON did
3 for a living, to which LIMON replied that he worked at shows and conventions. C.M. asked
4 LIMON if he worked at the SHOT Show, to which LIMON replied in the affirmative.

5 9. In addition to the aforementioned shotgun, LIMON also purchased a MAGPUL
6 PMAG 20-round AR-10 magazine.

7 10. The unidentified BMA purchased .223 caliber ammunition, a MAGPUL PMAG
8 40-round magazine, a MAGPUL PMAG 30-round Gen 2 magazine, and a MAGPUL MOE
9 M-LOK MVG Grip, all paid for in cash.

10 11. During a follow-up investigation, ATF Agents and CGIC Detectives reviewed
11 surveillance footage from Gun Shop Las Vegas in reference to the aforementioned encounter.
12 The surveillance footage showed a black Chevrolet Impala arrive in front of the business and
13 the previously mentioned three individuals subsequently exit the vehicle and enter the business.
14 The Chevrolet Impala in question had apparent chrome door handles and was missing a front
15 license plate.

16 12. On February 11, 2019, ATF Special Agent ("SA") G. Painton conducted a
17 canvass of the apartment complexes located in the vicinity of Gun Shop Las Vegas. During
18 said canvass, SA Painton observed a black Chevrolet Impala with chrome door handles and a
19 missing front license plate parked at The Pearl Apartments, located at 10250 Spencer St., Las
20 Vegas, NV 89183. A query of the rear license plate (NV# GK D022) returned results showing
21 the registered owner to be Jamikko FOSTER. Upon reviewing a Nevada Department of Motor
22 Vehicles (DMV) photograph of FOSTER, agents positively identified him as being the
23 unidentified BMA who entered Gun Shop Las Vegas two days prior.

24

1 13. On February 11, 2019, ATF SA M. LaRusso contacted Freeman Co., who is
 2 contracted with the National Shooting and Sports Foundation (NSSF), which organizes and
 3 operates the SHOT Show every year, in reference to obtaining a Payroll Report for Freeman
 4 employees who worked the 2019 SHOT Show. More specifically, SA LaRusso sought
 5 information about those employees on Freeman Company's payroll between January 25, 2019
 6 and January 27, 2019, as this was the timeframe during which it was believed the theft of 52
 7 firearms from Remington Arms occurred. A Freeman Company payroll roster listed Jamikko
 8 FOSTER as having been paid for eight hours. The payroll roster also listed FOSTER's
 9 corresponding Task Number as # 005, which is the task number utilized to identify the
 10 following: Exhibit Freight Fork Operator, Ground Guy, Pusher, Airfreight, Small package,
 11 Foreman, Supervisors, Leads.

12 14. On February 11, 2019, Freeman Co. provided SA LaRusso with copies of the
 13 Freight Crew sign-in sheets during the timeframe of January 25, 2019, and January 27, 2019. A
 14 timesheet dated January 25, 2019, listed Jamikko FOSTER as having worked during the
 15 timeframe of 2300 – 0758 hours, with a half hour lunch break.

16 15. On February 11, 2019, LVMPD CGIC Detective / ATF Task Force Officer
 17 (TFO) T. Chapman obtained state telephonic search warrants for FOSTER's residence, located
 18 at 10250 Spencer St., Apt. # 2024, Las Vegas, NV 89183, and vehicle, further described as a
 19 2013 Chevrolet Impala (NV# GK D022; VIN# 2G1WC5E37D1209739). ATF and the
 20 LVMPD CGIC subsequently served said warrant and recovered the following firearms from
 21 FOSTER's residence:

22 ///

<u>MAKE</u>	<u>MODEL</u>	<u>CAL.</u>	<u>TYPE</u>	<u>SERIAL #</u>	<u>FFL</u>
Tisas-Trabzon	Regent SP-1	9mm	Pistol	T0620-17CA00152	LKCI, Ltd.
Tisas-Trabzon	Regent SP-2	9mm	Pistol	T0620-17CA00156	LKCI, Ltd.

1	Tisas-Trabzon	Faith 13	.380	Pistol	T0620-18J00041	LKCI, Ltd.
2	Tisas-Trabzon	Regent P45	.45	Pistol	T0620-17Y00415	LKCI, Ltd.
3	Tisas-Trabzon	Regent P45	.45	Pistol	T0620-17BT00007	LKCI, Ltd.
4	Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17AP00002	LKCI, Ltd.
5	Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17BU00005	LKCI, Ltd.
6	Advanced Armament	Cyclops	.50	Silencer	500097	Remington Arms
7	High Standard	103	.22LR	Pistol	1183064	Remington Arms
8	Ruger	22/45 Lite	.22LR	Pistol	391-23465	Remington Arms
9	Advanced Armament	Cyclops	.50	Silencer	50-0061	Remington Arms
10	Heckler & Koch	MP5A3	9mm	Machine Gun	62-334300	Remington Arms
11	Advanced Armament	Mini-4	5.56	Silencer	A10438	Remington Arms
12	Advanced Armament	Aviator 2	.22LR	Silencer	AV203428	Remington Arms
13	Advanced Armament	762-SD	7.62	Silencer	B15561	Remington Arms
14	Glock	43	9mm	Pistol	BBUF003	Remington Arms
15	Denel Land Systems	SS77 MK1	.30-06	Machine Gun	DLS00233	Remington Arms
16	Advanced Armament	Element 2	.22LR	Silencer	EL22987	Remington Arms
17	Remington	R4E	5.56	Machine Gun	FFR000018	Remington Arms
18	FNH	FNX-45	.45	Pistol	FX3U036523	Remington Arms
19	Advanced Armament	MG-SD	7.62	Silencer	G0826	Remington Arms
20	Advanced Armament	MG-SD	7.62	Silencer	G0829	Remington Arms
21	Advanced Armament	SR-5	5.56	Silencer	H00750	Remington Arms
22	Advanced Armament	Halcyon	.22	Silencer	HAL0278	Remington Arms
23	Advanced Armament	Halcyon	.22	Silencer	HAL0635	Remington Arms
24	Smith & Wesson	M&P9	9mm	Pistol	HPX4209	Remington Arms
	Advanced Armament	Illusion	9mm	Silencer	IL902694	Remington Arms
	Advanced Armament	M4-2000	5.56	Silencer	M08138	Remington Arms

1	Advanced Armament	M4-2000	5.56	Silencer	M6593	Remington Arms
2	Remington	R-5	5.56	Rifle	MB000046	Remington Arms
3	Springfield	XDM	9mm	Pistol	MG445400	Remington Arms
4	Advanced Armament	MK13-SD	.300WM	Silencer	MK00496	Remington Arms
5	Advanced Armament	MK13-SD	.300WM	Silencer	MK00499	Remington Arms
6	Marlin	1894	.357 MAG	SBR	MR53419E	Remington Arms
7	Advanced Armament	762-SDN-6	7.62	Silencer	N12665	Remington Arms
8	Remington	700	.308 WIN	Pistol	RR30824L	Remington Arms
9	Remington	700	6.5	Rifle	RR30968L	Remington Arms
10	Advanced Armament	Titan-QD	.338 LM	Silencer	TI 00002	Remington Arms
11	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00001	Remington Arms
12	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00002	Remington Arms
13	Advanced Armament	TI-Raid 30	.300 WIN	Silencer	TIR00004	Remington Arms
14	Advanced Armament	300TM	.300 WM	Silencer	TM00324	Remington Arms
15	Advanced Armament	300TM	.300 WM	Silencer	TM10196	Remington Arms
16	Advanced Armament	Tirant45M	.45	Silencer	TR45M 0044	Remington Arms
17	Advanced Armament	Tirant45M	.45	Silencer	TR45M 0075	Remington Arms
18	Advanced Armament	Tirant45M	.45	Silencer	TR45M04953	Remington Arms
19	Advanced Armament	Tirant9M	9mm	Silencer	TR9M01211	Remington Arms
20	Advanced Armament	Tirant9M	9mm	Silencer	TR9M01267	Remington Arms
21	Advanced Armament	SR-7	7.62	Silencer	X01341	Remington Arms
22	Advanced Armament	SR-7 L	7.62	Silencer	X01394	Remington Arms
23	Advanced Armament	SR-5	5.56	Silencer	X50210	Remington Arms
24						

1	Glock	34	9mm	Pistol	YVY715	Remington Arms
2	Sauer & Sohn	S100	6.5	Rifle	C017857	Blaser USA, Inc.
3	Mauser	M18	6.5	Rifle	LC014288	Blaser USA, Inc.
4	Advanced Armament			Silencer	JA000003	[This is registered to Remington, but was not reported stolen]
5	Advanced Armament			Silencer	JA000002	[This is registered to Remington, but was not reported stolen]

6
7 16. On February 12, 2019, LVMPD CGIC Detective / ATF Task Force Officer
8 (TFO) T. Chapman obtained a state telephonic search warrant for Eduardo LIMON's
9 residence, located at 7990 Crowder St., Las Vegas, NV 89139. ATF and the LVMPD CGIC
10 subsequently served said warrant and recovered the following firearms from LIMON's
11 residence:

12 MAKE	13 MODEL	14 CAL.	15 TYPE	16 SERIAL #	17 FFL
Tisas-Trabzon	Regent CC45	.45	Pistol	T0620-17BU00006	LKCI, Ltd.
Arms Corp.	M1911-A1C2	9mm	Pistol	CIT029778	[This firearm was reported stolen by Legacy Sports Intl. under LVMPD Event # 170117-0759]
Advanced Armament	Halcyon	.22	Silencer	HAL0275	Remington Arms
Remington	R-10	7.62	Rifle	MA000085	Remington Arms
Remington	1911R1	9mm	Pistol	RHH018551	Remington Arms
Glock	19	9mm	Pistol	SGX924	Remington Arms
Advanced Armament	Tirant45M	.45	Silencer	TIQD 01525	Remington Arms
Advanced Armament	Tirant9M	9mm	Silencer	TR9M01210	Remington Arms
Mauser	M18	6.5	Rifle	LC014277	Blaser USA, Inc.
Maverick Arms	88	12 gauge	Shotgun	MV0334608	[LIMON purchased this firearm from Gun Shop Las Vegas on 02.09.19]

1 17. One of the pistols had a clamp attached to a security cable, which was still
2 attached to the trigger guard. The cable was cut approximately one inch from the trigger guard.
3 Based on your Affiant's training and experience, this would give any reasonable person
4 knowledge or reasonable cause to believe that said firearm had been recently stolen.

5 18. SA LaRusso, based on his completion of the ATF Interstate Nexus Training
6 Program in 2012 and the ATF Advanced Interstate Nexus Training Program in 2015, is of the
7 opinion that the aforementioned firearms have been previously shipped and/or transported
8 interstate, thereby affecting interstate commerce.

9 19. On February 12, 2019, SA LaRusso contacted ATF Industry Operations
10 Investigator (IOI) J. Han, who conducted queries of FOSTER and LIMON in the ATF
11 National Firearms Registration and Transfer Record (NFRTR), which returned negative results
12 reference having any National Firearms Act (NFA) firearms registered in their name.

13 20. Based on the foregoing, your Complainant believes that there is probable cause to
14 believe that, on or about February 12, 2019, Eduardo LIMON committed the offenses of
15 Possession of a Stolen Firearm, in violation of Title 18, United States Code, Sections 922(j) and
16 924(a)(2); and Possession of an Unregistered Firearm, in violation of Title 26, United States
17 Code, Sections 5841, 5861(d), and 5871.



Christopher D. Loudermilk, Special Agent
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SUBSCRIBED and SWORN to before me
This 12th day of February, 2019.

~~UNITED STATES MAGISTRATE JUDGE~~